

ORIGINAL

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**FILED**  
Clerk  
District Court

**AUG - 8 2008**

**For The Northern Mariana Islands**  
By \_\_\_\_\_  
(Deputy Clerk)

Attorney for Tomoyuki Nagata, Dr. Jun Takimoto, Mayumi Takimoto and Sali Takimoto, a minor by her next best friend her mother, Mayumi Takimoto,

UNITED STATES DISTRICT COURT  
FOR THE  
NORTHERN MARIANA ISLANDS

TOMOYUKI NAGATA, DR. JUN  
TAKIMOTO, MAYUMI TAKIMOTO AND  
SALI TAKIMOTO, A MINOR BY HER  
NEXT BEST FRIEND HER MOTHER,  
MAYUMI TAKIMOTO,

Plaintiffs,

vs.

BRENT J. HINKEMEYER, TAGA AIR  
CHARTER SERVICES, INC., TINIAN  
DYNASTY HOTEL, INC., HONG  
KONG ENTERTAINMENT  
(OVERSEAS)  
INVESTMENT, LTD., and DOES 1-75  
Defendants.

CIVIL CASE NO. 08-**0034**

*EX PARTE* MOTION AND PETITION FOR  
APPOINTMENT  
OF GUARDIAN AD LITEM

MAYUMI TAKIMOTO, by and through her counsel, respectfully moves/petitions the Court to be appointed as Guardian Ad Litem for SALI TAKIMOTO, her minor child, pursuant to Rule 17(c) of the Federal Rules of Civil Procedure, for the purpose of prosecuting her claim for loss of consortium, resulting from her father's injuries sustained in a plane crash in Saipan, on August 11, 2006, and in support thereof states as follows:

1. This Court has jurisdiction in this matter pursuant to 28 U.S.C. §§ 1331 and 1332.
2. The Petitioner and the minor child are residents of Japan.

3. Petitioner is the mother of the minor child.

Dated this August 8, 2008.

Respectfully submitted,

RICHARD W. PIERCE LAW OFFICE, LLC

By:   
RICHARD W. PIERCE

Attorney for Tomoyuki Nagata, Dr. Jun Takimoto, Mayumi Takimoto and Sali Takimoto, a minor by her next best friend her mother, Mayumi Takimoto.